

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

MONDELÉZ GLOBAL, LLC

and

Case 13-CA-170125

BAKERY, CONFECTIONERY, TOBACCO  
WORKERS & GRAIN MILLERS LOCAL  
UNION NO. 300, AFL-CIO-CLC.

**RESPONDENT'S EXCEPTIONS TO  
ADMINISTRATIVE LAW JUDGE'S DECISION**

Pursuant to Section 102.46 of the National Labor Relations Board's Rules and Regulations, Respondent Mondelēz Global, LLC (the "Respondent" or "MG") respectfully files the following limited exceptions and supporting brief to the Decision of Administrative Law Judge ("ALJ") Charles Muhl dated August 14, 2017.<sup>1</sup> The ALJ correctly dismissed the complaint finding that Respondent did not violate Section 8(a)(5) by refusing to provide all of the information requested by the Union in its January 27, 2016 letter. The following limited exceptions are filed in the event exceptions are filed by the Counsel for the General Counsel and/or the Union as to the ALJ's findings on relevance and the Board, consequently, is inclined to overrule those findings since the Respondent had also raised a confidentiality defense.

I.

Respondent takes exception to the ALJ's finding that, if an evaluation of the Respondent's confidentiality claim were required, the Respondent did not establish a legitimate claim of confidentiality. (ALJD 14-15).

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<sup>1</sup> References to the ALJ's Decision are set forth as (ALJD \_\_\_\_). References to the stipulated record are set forth as "R at ¶ \_\_\_\_." References to the exhibits in the stipulated record are set forth as "Jt. Ex. \_\_\_\_."

II.

Respondent takes exception to the ALJ's finding that the statements of witnesses Seeber and DiStefano were blanket and speculative assertions. (ALJD 14-15).

WHEREFORE, for the reasons stated herein and in Respondent's supporting brief filed contemporaneously herewith, the Administrative Law Judge's finding on the Respondent's confidentiality claim should not be upheld by the Board.

DATED this 11th day of September, 2017.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

By 

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**CERTIFICATE OF SERVICE**

I certify that on September 11, 2017, a copy of the foregoing **RESPONDENT'S EXCEPTIONS TO ADMINISTRATIVE LAW JUDGE'S DECISION** was Electronically Filed as a .pdf document via the NLRB's e-filing system and transmitted via e-mail to the following parties:

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